



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

The Administrator

400 Seventh Street, S.W.
Washington, D.C. 20590

AUG - 6 1999

The Honorable Jim Hall
Chairman
National Transportation Safety Board
490 L'Enfant Plaza East, SW
Washington, DC 20594

Dear Chairman Hall:

This is in response to National Transportation Safety Board (NTSB) Safety Recommendation P-99-1. This recommendation addresses the protection of underground pipeline facilities during directional drilling operations.

P-99-1 When reviewing pipeline operator safety programs, ensure that the operators' damage prevention programs include actions to protect their facilities when directional drilling operations are conducted in proximity to those facilities.

This recommendation results from NTSB's evaluation of the rupture of a natural gas pipeline near Indianapolis, Indiana. The ignition of the escaping gas caused a death and an injury. NTSB determined that the probable cause of this incident was the failure of the pipeline operator to have adequate controls in place to ensure that directional drilling operations carried out in the proximity of existing underground facilities would not cause damage to those facilities.

RSPA revised its inspection form for hazardous liquid pipelines to specifically examine how operators monitor trenchless technology operations in the vicinity of underground pipelines. Attachment 1 is a copy of the section of the inspection form relating to "Locating and Marking Pipelines (Damage Prevention)." This section notes the criticality of locating buried pipe, and the qualification of personnel performing this work, whether employed by the operator or by contract service (e.g. line locate company, corrosion survey company, pipeline surveyors). RSPA revised this section of the inspection form because recent accidents have demonstrated the need for additional diligence when directional drilling is used in proximity to a pipeline. Further, the form now directly asks whether the operator's damage prevention program includes actions to protect its facilities when directional drilling operations are conducted in proximity to the facilities. RSPA is currently making similar changes to

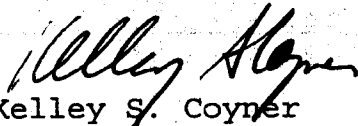
the natural gas inspection form. In the meantime, RSPA is providing supplemental inspection guidance to the natural gas inspectors.

RSPA issued an advisory bulletin to inform pipeline operators of the hazards of directional drilling and ways to protect their underground facilities. Because facilities are at different depths due to varying regulatory requirements and business practices, this advisory emphasizes the possibility of damaging underground facilities without being aware of it. The advisory bulletin (Attachment 2) also provides information on the inspection form discussed above.

RSPA believes these actions fully address NTSB Safety Recommendation P-99-1. We request that this recommendation be classified as "Closed - Acceptable Action."

If we can be of further assistance, please contact me or Jack Murray, Director, Office of Policy and Program Support at (202) 366-4831.

Sincerely,


Kelley S. Coyner

Enclosures: 2

cc: Robert Chipkevich, NTSB

Locating and Marking Pipelines (Damage Prevention)

It is critical that personnel who locate buried pipe in the course of their work are qualified and competent. Personnel performing this work may be operator or contract service company employees (line locate company, corrosion survey company, pipeline surveyors, etc.). **Additionally, recent accidents have demonstrated the need for diligence where directional drilling and other trenchless technology operations will be used in proximity to a pipeline.**

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45) Does the operator use contractor or company personnel for locating purposes? Does the operator participate in a qualified One-Call System?

HQ ___ Field ___ Satisfactory ___ Needs Improvement ___ NA/NC ___

Identify source of information:

O&M Manual Page #s

Person(s) Interviewed:

Comments:

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46) Does the operator have a quality control system to monitor contractor and employee locating and marking performance? Does the system track mismarks and other performance problems? What is an allowable error?

HQ ___ Field ___ Satisfactory ___ Needs Improvement ___ NA/NC ___

46R) Associated Records?

HQ ___ Field ___ Satisfactory ___ Needs Improvement ___ NA/NC ___

Overall Quality of Program: Satisfactory ___ Needs Improvement ___ NA/NC ___

Identify source of information:

O&M Manual Page #s

Record Identification (date, etc.) _____

Field Location(s) (MP or Station #) _____

Person(s) Interviewed: _____

Comments: _____

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47) Does the operator's damage prevention program include actions to protect their facilities when directional drilling or other trenchless technology operations are conducted in proximity to the facilities?

HQ ___ Field ___ Satisfactory ___ Needs Improvement ___ NA/NC ___

47R) Associated Records?

HQ ___ Field ___ Satisfactory ___ Needs Improvement ___ NA/NC ___

Overall Quality of Program: Satisfactory ___ Needs Improvement ___ NA/NC ___

Identify source of information:

O&M Manual Page #s _____

Record Identification (date, etc.) _____

Field Location(s) (MP or Station #) _____

Person(s) Interviewed: _____

Comments: _____
